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 13 *MotionPoint Corporation*

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15 UNITED STATES DISTRICT COURT  
 16 NORTHERN DISTRICT OF CALIFORNIA  
 17 OAKLAND DIVISION

19 TRANSPERFECT GLOBAL, INC.,  
 20 TRANSPERFECT TRANSLATIONS  
 INTERNATIONAL, INC., AND  
 21 TRANSLATIONS.COM, INC.,

22 Plaintiffs/Counterclaim  
 Defendants,

23 v.

24 MOTIONPOINT CORPORATION,  
 25 Defendant/Counterclaim  
 Plaintiff.

Case No. CV 10-02590 CW (JCS)

**STIPULATION AND [PROPOSED]  
 ORDER RE: MOTION TO SEAL  
 PORTIONS OF MOTIONPOINT'S  
 OPPOSITION TO TRANSPERFECT'S  
 MOTION FOR DISQUALIFICATION  
 [CLR 7-11, 7-12, 79-5]**

**Date:** June 6, 2012  
**Time:** 9:00 a.m.  
**Judge:** Hon. Joseph C. Spero

## **STIPULATION**

WHEREAS, TransPerfect has identified or designated certain information as confidential and has requested that such information be sealed;

WHEREAS, portions of MotionPoint's Opposition to TransPerfect's Motion for Disqualification, the McCaffrey Declaration and Exhibits F-L, and the Freed Declaration and Exhibit B contain information that TransPerfect has identified or designated as confidential;

THEREFORE, the parties hereby stipulate and agree that MotionPoint may, pursuant to Civil Local Rule 79-5(d), file a redacted version of its Opposition to TransPerfect's Motion for Disqualification, as well as a redacted versions of the McCaffrey Declaration and Exhibits F-L, and the Freed Declaration and Exhibit B. MotionPoint will also simultaneously lodge under seal with the Court the unredacted versions of these documents.

**SO STIPULATED.**

Date: June 1, 2012

/s/ Alexander Ott  
Alexander Ott

*Attorneys for Defendant/Counterclaim  
Plaintiff MotionPoint Corporation*

/s/ L. Okey Onyejekwe  
L. Okey Onyejekwe Jr., M.D.

/s/ Adrian J. Sawyer  
Adrian J. Sawyer

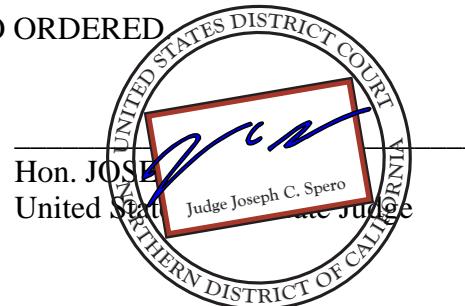
*Attorneys for Plaintiffs/Counterclaim  
Defendants TransPerfect Global, Inc.,  
Transperfect Translations International,  
Inc., and Translations.com, Inc.*

Attorneys for McDermott Will & Emery LLP

**[PROPOSED] ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: June 4, 2012



1 I, Adrian Sawyer, am the ECF User whose ID and password are being used to file this  
2 **STIPULATION AND [PROPOSED] ORDER RE: MOTION TO SEAL PORTIONS OF**  
3 **MOTIONPOINT'S OPPOSITION TO TRANSPERFECT'S MOTION FOR**  
4 **DISQUALIFICATION [CLR 7-11, 7-12, 79-5]**. In compliance with General Order 45, X.B., I  
5 hereby attest that Alexander Ott, Counsel for Defendant MotionPoint Corporation, and L. Okey  
6 Onyejekw , Counsel for Plaintiffs, has concurred in this filing.

7

8 DATED: June 1, 2012

**KERR & WAGSTAFFE LLP**

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10 By /s/ Adrian J. Sawyer \_\_\_\_\_  
ADRIAN J. SAWYER

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